

REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Claims

Claim 1 has been re-written to include the subject matter of original claims 2 and 3. In addition, the claims have been amended to overcome the **objections** listed in item 2 on page 2 of the Official Action, and to delete the phrase “and related processing” in order to overcome the rejection of claims 3-7 under **35 USC §112, 2nd Paragraph**.

Because the amendments merely combine subject matter included in the original claims and make various formal changes, it is respectfully submitted that the amendments do not constitute “new matter.”

2. Rejection of Claims 1-3 Under 35 USC §102(e) in view of U.S. Patent No. 6,847,704 (Cherchali)

This rejection is respectfully traversed on the grounds that the Cherchali patent fails to disclose or suggest the combination of a VoIP device and ITSP connected to the VoIP device over the Internet, as claimed, in which HTTP is employed as a transfer protocol and XML documents are used to automatically configure the VoIP device. Instead, the Cherchali patent merely discloses a telephony adapter connected between a conventional telephone set and both a voice network and data network.

According to the invention, a communication system that includes a VoIP device and an ITSP connected thereto over the Internet is adapted to employ HTTP as a transfer protocol, and enables the VoIP device to issue require provision-request document in XML syntax to a provisioning server of the ITSP in order to verify the identification of the provision-request documents. If the verification is true, then the provisioning server retrieves setting parameters required to configure the VoIP device from a user database, stores the configuration parameters

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in a provision-response package written in XML syntax, and sends the provision-response package back to the VoIP device. The VoIP device of claim 1 then performs a configuration on itself based on the sent-back configuration parameters in response to receiving the provision-response package. After finishing the configuration, the VoIP device recited in claim 1 automatically proceeds with a registration to a call agent of the ITSP. By utilizing the widely employed HTTP and XML tools, with their high compatibility and expansibility, the present invention has the advantage of being able to significantly reduce the development cost of VoIP devices and error detection times, and increase convenience in future maintenance and upgrading. In addition, the claimed invention enables the communication system to use one of two standard authentication techniques, including Cleartext Password and Digest Authentication to verify a VoIP device with respect to messages transferred by using HTTP by the VoIP device, so that it is possible to add highly safe authentication and encryption mechanisms to HTTP without adversely affecting the existing functions, and provide a high transmissibility and compatibility with respect to an existing firewall and NAT installed in a household or business.

In contrast, the Cherchali patent is directed to an architecture and technique for creating self-installable and portable telephony (dial tone) service that can be moved between any two locations and that has access to both a voice communication network and a data network. A telephony adapter is used as a subscriber premises device connected between a conventional telephone set and both the voice network and the data network. A provisioning server communicates with the telephony adapter through the data network and maintains a record of the subscriber's local telephone number and an IP address of the telephony adapter. As the subscriber moves from one location to another and turns on the telephony adapter, the telephony adapter will communicate with the provisioning server and re-establish phone service, always using the same local phone number of the subscriber. There is no suggestion in the Cherchali patent of employing HTTP as a transfer protocol between a VoIP device and an ITSP, and enabling the VoIP device to issue required provision-request documents in XML syntax to the provisioning server of the ITSP, as claimed. As a result, it is respectfully submitted that the

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Cherchali patent does not anticipate the claimed invention, and withdrawal of the rejection of claims 1-3 under 35 USC §102(e) is respectfully requested.

3. Rejection of Claims 4-5 Under 35 USC §103(a) in view of U.S. Patent No. 6,847,704 (Cherchali) and U.S. Patent Publication No. 2003/0177271 (Park)

This rejection is respectfully traversed on the grounds that the Park publication, like the Cherchali patent, fails to disclose or suggest the combination of a VoIP device and ITSP connected to the VoIP device over the Internet, as claimed, in which HTTP is employed as a transfer protocol and XML documents are used to automatically configure the VoIP device. Instead, the Park publication is directed to apparatus for providing device information over a network, including a message processing unit that processes input and output messages, an information producing unit that dynamically produces updated information based on data stored in a database and that provides the information in web document format, an information managing unit that manages characteristic information and additional information of the device, and a data processing unit that processes a transaction of the data stored in the database. The characteristic information and the additional information of the device existing in the home network created in an XML format is converted into a predetermined document structure and stored in the database, so that remote users can have different access authority from each other by assuring independence between the domestic devices and remote devices. Other than using known web document formats, the system disclosed in the Park publication has nothing to do with the claimed invention, and does not make up for the deficiencies of the Cherchali patent. Withdrawal of the rejection of claims 4 and 5 under 35 USC §103(a) is accordingly requested.

4. Rejection of Claims 6-7 Under 35 USC §103(a) in view of U.S. Patent No. 6,847,704 (Cherchali) and U.S. Patent Publication Nos. 2003/0177271 (Park) and 2005/0031108 (Eshun)

This rejection is respectfully traversed on the grounds that the Eshun publication, like the Cherchali patent and Park publication, fails to disclose or suggest the combination of a VoIP device and ITSP connected to the VoIP device over the Internet, as claimed, in which HTTP is employed as a transfer protocol and XML documents are used to automatically configure the

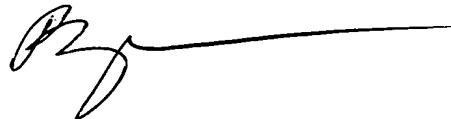
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VoIP device. Instead, the Eshun publication is directed to a system for discovery of provisioning information by telephones in a frame switched network *without* a broadcast based protocol. When a customer premises internet telephony device (CPE) is manufactured, the factory stores a unique CPE ID number and a contact for a pre-provisioning server in non volatile memory of the CPE, such that when a customer purchases the CPE and the CPE is connected to the internet, the CPE contacts the pre-provisioning server using the contact stored in non volatile memory. Again, this reference does not disclose any sort of XML provision-request document transfer between the VoIP device and the ITSP, and therefore could not have made up for the deficiencies of the Cherchali patent, considered in view of the Park publication. Withdrawal of the rejection of claims 6-7 under 35 USC §103(a) is accordingly requested.

Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

BACON & THOMAS, PLLC

A handwritten signature in black ink, appearing to read 'B. Urcia', followed by a long horizontal line extending to the right.

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Date: February 19, 2008

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